

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DENNIS CORHN JR.  
PLAINTIFF,

VS.

JAY COOLEY,  
MATT MACAULEY,  
JARED BUCHIN,  
(UNKNOWN) GIBSON,  
JANE DOE#1 (IBC NURSE)  
DEFENDANTS.

CASE NO. **1:22-cv-282**  
HON. **Sally J. Berens**  
MAG. **U.S. Magistrate Judge**

**FILED - LN**

March 25, 2022 2:10 PM

CLERK OF COURT

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY eed / SCANNED BY 100375

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DENNIS CORHN JR.#611013  
BELLAMY CREEK CORR. FAC.  
1727 W.BLUEWATER HWY.  
IONIA, MICHIGAN 48846  
PLAINTIFF, PRO SE

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EXPARTE MOTION FOR THE APPOINTMENT  
OF COUNSEL

NOW COMES, PLAINTIFF DENNIS CORHN JR., PURSUANT TO 28 USC 1915(d)  
REQUESTING THIS COURT TO APPOINT COUNSEL TO REPRESENT PLAINTIFF IN  
THIS CASE FOR THE FOLLOWING REASONS:

- 1) THE INJURIES PLAINTIFF SUFFERS WITH (AS A RESULT OF DEFENDANTS ALLEGED ACTIONS) HAVE CAUSED A VISUAL IMPAIRMENT LEAVING PLAINTIFF UNABLE TO ADEQUATELY READ OR WRITE WITHOUT EXPERIENCING SEVERE PAIN AND LOSS OF FOCUS.
- 2) THE ISSUES INVOLVED IN THIS CASE ARE COMPLEX IN FACT AND LAW. PLAINTIFF HAS FILED CLAIMS THAT ALLEGE MEDICAL NEGLECT, RETALIATION, DELIBERATE INDIFFERENCE AND FEDERAL CONSPIRACY

WHICH WILL REQUIRE PLAINTIFF TO PRODUCE EXPERT WITNESSES AT TRIAL AND EXTENSIVE RESEARCH AND DISCOVERY, SOME OF WHICH PLAINTIFF IS NOT ALLOWED TO REVIEW. PLAINTIFFS CLAIMS ARE COMPLEX IN FACT AS PLAINTIFF ALLEGES THAT DEFENDANTS HAVE CAUSE HIM TO SUFFER A BRAIN ANEURYSM THAT REQUIRED BRAIN SURGERY AND PLACEMENT OF MEDICAL DEVICES THROUGHOUT HIS BRAIN. PLAINTIFF ALSO CLAIMS THESE SAME OFFICIALS SUBJECTED PLAINTIFF TO MULTIPLE FORMS OF RETALIATION AND INTIMIDATION IN ATTEMPT TO STOP PLAINTIFF FROM PURSUING THIS ACTION.

- 3) PLAINTIFF IS EXTREMELY LIMITED IN RESEARCH MATERIALS IN THE PRISON LIBRARY. THE PRISON LIBRARIES DO NOT PROVIDE ANY MEDICAL RESEARCH DATABASE OR DIRECTORY, NOR DOES THE LIBRARIES PROVIDE DIRECTORIES FOR EXPERT WITNESSES OR ATTORNEYS THAT MIGHT QUALIFY OR HELP PLAINTIFF IN THIS CASE.
- 4) PLAINTIFF HAS BEEN TURNED AWAY, IGNORED AND DENIED HELP FROM NUMEROUS ATTORNEYS THAT OTHERS HAVE SUGGESTED THAT HE CONTACT. PLAINTIFF HAS EVEN EXTENDED HIS SEARCH TO ACLU AND VARIOUS LAW SCHOOLS IN ATTEMPT TO OBTAIN A REFERRAL BUT HAS BEEN UNSUCCESSFUL IN ALL ATTEMPTS.
- 5) DESPITE PLAINTIFFS INJURIES AND IMPAIRMENT HE HAS BEEN DENIED ALL ACCESS TO THE PRISON LEGAL WRITER PROGRAM WHICH COULD OF PROVIDED THE HELP HE NEEDED.
- 6) PLAINTIFF STRONGLY BELIEVES THIS COMPLAINT SHOWS A PRIMA FACIE CASE AND THAT IT SHOWS MERIT TO HIS ALLEGATIONS. IF THIS COURT DENIES COUNSEL THEN THAT DENIAL WOULD ALTER THE SUBSTANCE OF HIS CLAIMS AND PLAINTIFF WOULD NOT HAVE A FAIR OR EQUAL OPPORTUNITY TO PURSUE THIS ACTION.

WHEREFOR, PLAINTIFF RESPECTFULLY REQUESTS THIS COURT TO APPOINT COUNSEL TO PLAINTIFF IN THE ABOVE CAPTIONED CASE IN ORDER TO PROVIDE PLAINTIFF A FAIR AND EQUAL OPPORTUNITY IN THIS COURT.

Respectfully submitted,

DATE: 1/5/22

Dennis Corhn Jr.

Dennis Corhn Jr.  
Plaintiff, Pro se

Dennis Corhn Jr. ~~the~~  
Bellamy Creek Corr Facility  
1727 W. Bluewater Hwy  
Ionia, MI 48846

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